

Per C. Olson, OSB 93386
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Of Attorneys for Defendant Cyrus Andrew Sullivan

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

CYRUS ANDREW SULLIVAN

Defendant.

Case No. 3:13-CR-00064-HZ

MOTION TO WITHDRAW AS
COUNSEL AND FOR
APPOINTMENT OF NEW COUNSEL

Per C. Olson, attorney for defendant Cyrus Andrew Sullivan, hereby moves to withdraw as counsel for the defendant, as the district court matter has concluded.

Defendant has indicated a desire to file a notice of appeal. The notice of appeal is due to be filed on August 5, 2013. Counsel asks that the court direct the Federal Public Defender's Office to find suitable counsel to represent defendant in the appeal, as that would be in defendant's best interest. In the event that new counsel cannot be found

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within a short period of time, the court is asked to extend the deadline for filing a notice of appeal by 14 days.

DATED this 23rd day of July, 2013.

HOEVET, BOISE & OLSON, P.C.

s/ Per C. Olson
Per C. Olson, OSB #933863
Of Attorneys for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing MOTION TO WITHDRAW AS COUNSEL AND FOR APPOINTMENT OF NEW COUNSEL on:

Cyrus Andrew Sullivan
c/o Columbia County Jail
901 Port Avenue
St. Helens, OR 97051
Defendant

by mailing to said party a true copy thereof, contained in a sealed envelope, with postage paid, addressed to said party as stated above and deposited in the post office at Portland, Oregon.

DATED this 23rd day of July, 2013.

HOEVET, BOISE & OLSON, P.C.

s/ Per C. Olson
Per C. Olson, OSB #933863
Of Attorneys for Defendant